

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

In the matter of the Application of  
San Diego Gas & Electric Company  
(U 902-E) for a Certificate of Public  
Convenience and Necessity for the  
Sunrise Powerlink Transmission  
Project

Application No. 06-08-010  
(Filed August 4, 2006)

Application No. 05-12-014  
(Filed December 14, 2005)

**PROTEST OF THE MUSSEY GRADE ROAD ALLIANCE**

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Dated: September 22, 2006

## **PROTEST OF THE MUSSEY GRADE ROAD ALLIANCE**

### **1. INTRODUCTION**

Pursuant to Rule 44 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Mussey Grade Road Alliance (“Alliance”) submits this Protest in opposition to the Application of the San Diego Gas & Electric Company (“SDG&E”) for a Certificate of Public Convenience and Necessity (“CPCN”) for the Sunrise Powerlink Transmission Project (“Application”). The Application was filed on December 14, 2005; and subsequently re-filed on August 4, 2006. The period for submitting protests was extended to September 22, 2006; therefore this Protest is timely pursuant to the Commission’s Rules of Practice and Procedure, Rule 44.1 and G.O. 131-D, Section XII.

The Alliance is a grassroots citizen organization dedicated to the preservation and protection of Mussey Grade Road and environs in Ramona, California. The Alliance maintains a website on Mussey Grade Road at [www.musseygraderoad.org](http://www.musseygraderoad.org).

The Alliance enters this Protest in opposition to the proposed transmission line project of SDG&E because of the massive effects this project would have on Mussey Grade Road and environs. However, the Alliance is acutely aware that not only the Mussey Grade Road area, but vast portions of San Diego County, from the coastal regions and inter-coastal mountain areas to the Anza-Borrego Desert State Park, would also be extremely negatively impacted by this power line, should the Commission approve the application for a CPCN.

This project is not only destructive to the natural world, including Mussey Grade Road and environs; it is destructive as to its effects on discrete human communities. As no man is an island, so too no community is completely cut off from its surroundings – be they unspoiled natural wild lands or neighboring human communities with which they

share geographic space. And while communities are not completely separate from one another, it is also true that each community is special and can be distinguished from others based on its own unique characteristics.

The project also has larger effects with regard to the global energy business. Community concerns also involve the larger issues such as the nature of business competition and the desire on the part of businesses to reduce it, the broader consequences of the concentration of energy decisions in smaller numbers of hands and the direct effects on citizen ratepayers, and the tremendous profits to be earned and the overall effects of energy use on the planet.

That big picture is important. The power line project application can obscure the view of what is at stake concerning vital issues of energy production, energy provision and the future of energy in California. Therefore, the Alliance would like to put this project in perspective – look at it from a longer view before looking at it close up.

## **II. ISSUE # 1: THERE SHOULD BE CONSEQUENCES IF SDG&E IMPORTS ENERGY FROM MEXICO THROUGH “SUNRISE POWERLINK”**

It is widely acknowledged today that global warming exists. It is even acknowledged that California has already been affected by global warming. Recently, the California Climate Action Team, initiated by Governor Arnold Schwarzenegger last year, released a summary report of 17 scientific studies examining the potential impacts of climate change in California.<sup>1</sup> The report, “Our Changing Climate: Assessing the Risks to California” was a collaborative effort of the California Center for Climate Change, the only state-funded climate research center in the nation, a virtual center established by the California Energy Commission. The Summary report is a compilation of the science included in the Climate Action Team report that was released in April. The report warns that as the effects of global warming continue, California’s 1,100 miles

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<sup>1</sup> See “California Climate Action Team releases summary report,” August 16, 2006, Capitol Reports, <http://www.caprep.com/0806020.htm>

of coastline will face increased threats of rising sea levels, aggravating impacts of coastal storms and runoff from upstream flooding.

This is the backdrop of this power line application: the first of the biennial studies of the potential impact on the state of continued global warming tells us that there will be more effects in the future. Yet, while SDG&E denies that any power that will flow through its proposed power line would be generated in Mexico, and has repeatedly stated this in public and other forums, the Alliance believes that this remains a possibility.<sup>2</sup> And if power were generated from new plants across the border, emissions from those plants could amount to the same annual emissions from 400,000 cars.<sup>3</sup>

The issue here is if the project were approved and SDG&E eventually does import electricity on this line from generation plants built in Mexico by its parent company Sempra (rather than solar produced energy from Stirling Energy Systems facilities to be built in the Imperial County desert, as it claims) would there be any consequences? While there would assuredly be environmental consequences connected to this type of change in plans,<sup>4</sup> would there be any penalties imposed on SDG&E for taking a different direction from that which it told the world it was going to take?

There are, in fact, no assurances to the public who will eventually pay for this more than \$1.2 billion project, should it be approved, that it will only transmit renewables and that those renewables will be domestically produced. In fact, the SDG&E August 4<sup>th</sup> application is much thinner on the renewables issue and much thicker on the reliability

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<sup>2</sup> Others also doubt SDG&E's assertions that it will not transmit power from Mexico. See, September 13, 2006 letter from Congressman Bob Filner to CPUC Commissioner Dian Grueneich, where he states: "The project creates the real possibility for an increase in air emissions from new export power plants in the Mexicali region of Baja California, which do not meet the same stringent air quality stands in California, specifically the purchase of emission offset credits."

<sup>3</sup> The Sempra plant in Mexicali is 600 MW net and the EIS for the plant states max. NOx emissions of 187 tpy. Assuming 200 tpy as a reasonable number, one 600 MW plant would equal the NOx emissions of 200,000 typical 2005 model year autos, based on emissions of 2.05 pounds of NOx per year, according to authoritative sources. Two 600 MW plants would release NOx emissions of 400,000.

<sup>4</sup> There are no projections of the impact on Imperial County residents of releasing as much as 200 tons per year of NOx per 600 Mw combined-cycle plant equipped with catalytic converter, as well as substantial quantities of other harmful air pollutants into a troubled air basin that currently is in violation of Federal and state clean air standards for healthy air several days a year.

issues.<sup>5</sup> Even SDG&E admits in its chapter on renewables that they are not required by law to produce 20% of their energy from renewables until 2017.<sup>6</sup> If the rush to renewables, ostensibly to save the state from the effects of global warming, is of paramount importance to SDG&E,<sup>7</sup> then it would be unconscionable if the public and the Commission were to find out later – after approval of the CPCN – that the line would carry imported electricity generated in Mexico.<sup>8</sup> The sole remedy to prevent this would be for the Commission to establish a rule now that would prevent any kind of “bait and switch” on the project from occurring.

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<sup>5</sup> Chapter III, Renewable Energy, is a mere 16 pages; Chapter II, Reliability, is 34 pages of text and a total of 70 pages, including Tables. See, Public, Sunrise Powerlink Transmission Project Purpose and Need, Volume 2 Part 1, August 4, 2006, San Diego Gas & Electric Company. Despite the emphasis on reliability in the application, the issue of the potential vulnerability of the Imperial County Substation does not seem as important to the applicant. This substation is the place from which, as the Alliance understands it, all power lines travel through the area. The substation presents, obviously, its own target; so reliability is not only a matter of power lines alone.

<sup>6</sup> SB 1078 signed into law September 12, 2002 requires California to procure 20% of its electrical retail sales from renewable resources by December 31, 2017. However, SDG&E points to the Energy Action Plan, which it says “strives to attain the 20% goal by 2010 rather than 2017.” See, Chapter III, Renewable Energy, p. III-7.

<sup>7</sup> Even the name “Sunrise Powerlink” emphasizes SDG&E’s arguments that the proposed line is meant, above all else, for renewable solar energy. SDG&E’s new arrangement with the Imperial Irrigation District and Citizens Energy Corporation, encapsulated in a March 16, 2006 Memorandum of Agreement, was the subject of Joseph Kennedy’s presentation at the August 24<sup>th</sup> CAISO meeting. At the meeting Mr. Kennedy told the Board of Governors that global warming conditions mean that “searing heat” caused “the poor to die” and said that the proposed power line is designed to bring “green power to the people of San Diego.”

This is despite the opinion of Sempra Chairman and Chief Executive Donald Felsing, who told a reporter he doesn’t believe in global warming: “And although SDG&E says it will comply with state mandates on renewable energy, Felsing says he no interest in pursuing renewable energy projects elsewhere in the company. In fact, he expresses no interest in dealing with the issue of global warming, although environmentalists generally target the energy industry as among the biggest contributors to the problem. But Felsing said he is unconvinced that the phenomenon of global warming exists. ‘There is definitely a debate about global warming, and when you look at the opposing views, neither one has prevailed,’ Felsing said. For example, he said, ‘The coal industry says there is no evidence of global warming.’ Later he added: ‘I don’t think the science supports either side. So you ought to take a position of moderation. It’s difficult to take sides between smart people.’ His lack of conviction about global warming puts him at odds with the majority of climate scientists, as well as with views embraced by Gov. Arnold Schwarzenegger and California Public Utilities Commission President Michael Peevey, both of whom have been pressing for caps on the emissions from the energy industry.” See, “Sempra generating new energy,” by Craig Rose, San Diego Union Tribune, June 18, 2006 <http://www.signonsandiego.com/news/business/20060618-9999-lz1b18sempra.html>

<sup>8</sup> Obviously power generation in Mexico would also lead to more greenhouse gas emissions, in addition to emission contributing to overall air pollution.

**III. ISSUE # 2: COMPENSATION SHOULD BE PAID TO THE PUBLIC FOR DESTRUCTION OF PUBLICLY HELD LAND OCCURRING AS A RESULT OF THE CREATION OF INDUSTRIAL CORRIDORS THAT DEGRADE AND DEVALUE OPEN SPACE PRESERVES**

As stated previously in this Protest, each community is unique. Mussey Grade Road is no exception. As described in the Prehearing Conference Statement submitted by the Alliance, Mussey Grade was the main road from the coast to the Julian gold mines in the 19<sup>th</sup> century. Bisected in 1943 by the San Vicente Reservoir, the some five miles of remaining stagecoach route was recognized by the California State Historic Preservation Commission as a historical “Point of Interest” in 2003.

This historic road, which is located at approximately the mid-point of San Diego County, is also part of the unincorporated area of Fernbrook, a small village established in the late 19th century and which paralleled the development of the unincorporated town of Ramona itself. Mussey Grade is lined by ancient oaks and winds through a richly forested riparian area, which is surrounded by mountains. The road dead ends into the San Vicente Reservoir, and thus the Mussey Grade Road valley is its own unique and natural cul-de-sac. The valley is made up in the main of large rural ranch holdings, with the exception of Fernbrook and some recent housing built within the last decade.

The Alliance was formed in 1999 to preserve and protect this special area. To date the Alliance has engaged in a number of activities in furtherance of this goal, including intervening with the County of San Diego for the purpose of preserving some 2,200 acres of ranchland eventually purchased by the County as open space and known to locals as Boulder Oaks Ranch. The SDG&E proposed power line would run through this preserve, along with five other open space preserves in San Diego County.<sup>9</sup>

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<sup>9</sup> The preserves include Sycamore Canyon, Goodan Ranch, Barnett Ranch, San Vicente Highlands Open Space, and Boulder Oaks preserves. See, Proposed Project Inland Valley Link (page 4.9.9)

According to SDG&E, Mussey Grade Road falls within their Inland Valley Link area, an extensive area. Two of the largest county owned and maintained open space preserves are located in the Inland Valley Link: Sycamore Canyon and Boulder Oaks. SDG&E's application recognizes the importance of the open spaces in the vicinity of Ramona. The application states:

Open space is a primary factor contributing to the rural character of Inland Valley Link landscapes. Outside of urban and residential areas, the study area contains open spaces that provide high-quality scenic settings characterized by the varied topography and vegetation of the ecoregion.<sup>10</sup>

The fact that the proposed preferred route travels through so many county open space preserves is itself a matter of grave concern, especially because by doing so the project avoids people in favor of burdening preserved open space. Another discouraging aspect of running a power line through open space preserves is the extraordinary precedent this activity would set. While easements may exist in the open spaces of San Diego County, those easements are generally now occupied by a 69kV line. This existing line, while noticeable and unattractive in the wild spaces preserved by taxpayer money, is hardly comparable to the industrialized corridor SDG&E plans for the five county open space preserves. This corridor would contain both the existing 69kV line, possibly improved and enlarged, along with a 230kV line, as far as the Alliance can determine.

The application describes the area this way:

The alignment between N27 and N28 follows the existing SDG&E 69 kV transmission corridor that crosses through agricultural lands and open space. The existing transmission corridor is viewed by isolated rural residences on privately owned lands and by the public within the five open space preserves that are crossed by the alignment. **The preserves include Sycamore Canyon, Goodan Ranch, Barnett Ranch, San Vicente Highlands Open Space, and Boulder Oaks preserves. The preserves provide solitude and recreation in a variety of settings that include the**

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<sup>10</sup> See, 4.9.2.1.1 Landscape Visual Quality, Inland Valley Link

**most scenic within the Southern California Mountains and Valleys ecoregion and range from grand vistas, oak woodlands, grassy meadows, and abundant wildlife.**<sup>11</sup> (Emphasis Added)

Solitude or not, SDG&E plans to run a 230kV line through these five preserves. Even if the 69kV line were to disappear, the much larger and more obvious 230kV line planned by SDG&E would not only impact view sheds, it would slice through these precious open spaces in a completely incongruous way – alerting the taxpayers whose dollars ultimately paid to preserve the land for generations to come that the preservation was only partial promise.<sup>12</sup>

In the case Boulder Oaks, a 2,200 acre preserve of mountains, meadows, valleys and hills, lying in the shadow of Iron Mountain and overlooking the San Vicente Reservoir, the upgraded power line would indeed be unattractive, unappealing, unwelcome and unnatural. While it is true that the Boulder Oaks open space was established by the county following the acquisition of the power line easement, the fact that SDG&E wants to enlarge their infrastructure within the existing easement many years later after purchasing the easement leaves little comfort that this will be the last and final “improvement”.

In fact, common sense tells us that where an easement has been established, it will be used again and again. Arguments will be made that it pre-exists and therefore can legitimately be used for the purposes for which it was acquired. This logic is already in operation in other parts of the county in other easements, such as Torrey Hills, where SDG&E proposes to add yet more lines to already existing lines and infrastructure within their easement because they assume they can.

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<sup>11</sup> Proposed Project Inland Valley Link (page 4.9.9)

<sup>12</sup> A portion of these lands were purchased to fulfill the promise of the County of San Diego Multiple Species Conservation Program (“MSCP”) and are mitigation for present or future development in the county. The industrialization of these lands obviously lowers their mitigation value not only in the power line corridor itself, but in any direction in which the corridor is viewed from either inside or outside of the open space preserves.



The fact that in the Boulder Oaks example the easement occurs in publicly financed preserved open space is of no comfort when SDG&E has boldly planned the same treatment of enlarged infrastructure within their easement located in the preserve. The message is sent in this choice of route by SDG&E that nothing is sacred and the company's plans trump the county's plans for preservation.

This means that we can expect that Boulder Oaks open space and all the other county open spaces through which this proposed line runs on the preferred route will not have seen the last of this issue. We can expect that bit by bit more enlargement will occur; the same arguments being presented now will be presented again in the future, including threats of brownouts and blackouts should SDG&E not get its way.

For the residents of the Mussey Grade Road valley who worked on preservation of the 2,200 acres of Boulder Oaks, including in cooperation with Supervisor Dianne Jacob and supporting her efforts to preserve the land through purchase, the industrialization of this open space preserve is a bitter pill indeed. It also serves as a reminder to all taxpayers that nothing is what it seems in terms of preserving open space for future generations of San Diego County residents to enjoy.

If this kind of degradation is allowed to occur without compensation to the public who paid for the land, it would be unfair to taxpayers and unfair to their government, which worked with them to preserve the various open spaces that would be adversely and permanently impacted if the project were approved by the Commission. It would also signal that open space is vulnerable to devaluation by industrial usage – precisely because no one lives there. The message would be sent to local officials that the land they worked to preserve has no inherent value that would be detrimentally affected by power lines crossing it on 150' towers – and that this should be completely acceptable to everyone involved.

In fact, the degradation of open space preserves through the establishment of industrial power line corridors hosting massive poles and infrastructure is not acceptable.

Such activity degrades the value of the open space generally while it destroys the open space at the industrial corridor specifically. There is no reason for this type of unauthorized and unanticipated action on the part of SDG&E to be permitted. And, in the worst case, if it is permitted and the project is approved by the Commission, SDG&E should be required to compensate the taxpayers for the loss of the value of these publicly owned and supported lands that would be detrimentally and permanently impacted by a power line project, if approved by the Commission.

A determination of the value lost and financial payment owed would be separate from mitigation issues to be considered in the California Environmental Quality Act (“CEQA”) process of this application because no other mitigation is possible to compensate for the loss of use and the loss of the inherent value of the open space preserves that would result from placing huge power lines in the preserves. The preserves, like the nursery rhyme story of Humpty-Dumpty, are fragile and require greater efforts to be protected; otherwise they will share Humpty’s fate where “All the King’s horses and all the King’s men couldn’t put Humpty together again.”

The Commission should establish a rule regarding open space preserves in California and this type of intrusion; such a rule should require analysis of the economic loss to the public flowing from the destruction of public property on taxpayer supported open space preserves for private industry use and should require payment by private industry for that use. That economic loss would, no doubt, be significant. In the instant case, if SDG&E continued to desire a preferred route that runs through open space after open space in San Diego County all along the line, SDG&E should be required by this rule to financially compensate the public for that action.

#### **IV. CONCLUSION**

In light of the foregoing, the Alliance urges the Commission to incorporate into their consideration of the SDG&E application the issues presented herein.

Specifically, the Alliance respectfully requests the Commission answer the question

of whether there would, under the current requirements, be any penalties imposed upon the applicant if, providing the Commission approves this application for a CPCN, the line is used to import power from Mexico. If there is not a penalty mechanism in such a case, the Alliance requests that the Commission set up such a mechanism for this and all other applications in the future.

Secondly, the Alliance respectfully requests the Commission set up a rule to financially compensate the public for loss of use and of the inherent value of publicly supported and maintained open space preserves that would be impacted by this project and all other projects in the future.

Dated: September 22, 2006

Respectfully submitted,  
Mussey Grade Road Alliance

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have this day served a true copy of **PROTEST OF THE MUSSEY GRADE ROAD ALLIANCE** to parties listed on the following pages.

Service was completed by email where available or, where email service was not available, by causing true copies thereof, enclosed in sealed envelopes with first class postage prepaid, to be deposited in the United States Mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this \_\_\_\_ day of September, 2006, at San Diego, California.

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Diane Conklin

# CALIFORNIA PUBLIC UTILITIES COMMISSION

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**Filer: SAN DIEGO GAS & ELECTRIC COMPANY (U902E)**  
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